

James I. Stang (CA Bar No. 94435)  
Andrew W. Caine (CA Bar No. 110345)  
Gail S. Greenwood (CA Bar No. 169939)  
Brittany Mitchell M. Michael (*Pro Hac Vice*)  
PACHULSKI STANG ZIEHL & JONES LLP  
One Sansome Street, 34<sup>th</sup> Floor, Suite 3430  
San Francisco, California 94104-4436  
Telephone: 415-263-7000  
Email: jstang@pszjlaw.com  
acaine@pszjlaw.com  
ggreenwood@pszjlaw.com  
bmichael@pszjlaw.com

Attorneys for the Official Committee of Unsecured  
Creditors

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re

THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

Debtor.

Case No. 23-30564

Chapter 11

**DECLARATION OF BRITTANY  
MICHAEL IN SUPPORT OF THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS' MOTION  
FOR AN ORDER AUTHORIZING THE  
FILING OF DOCUMENTS UNDER SEAL**

I, Brittany M. Michael, declare under penalty of perjury as follows:

1. I am of counsel at the law firm of Pachulski Stang Ziehl & Jones LLP, counsel to the Official Committee of Unsecured Creditors ("Committee"). I am duly admitted to practice law in the United States District Courts for the Southern and Western Districts of New York and the District of Minnesota, and admitted to practice *pro hac vice* in this case. I submit this Declaration in support of *The Official Committee of Unsecured Creditors' Motion for an Order Authorizing the Filing of Documents Under Seal* (the "Motion to Seal"), filed herewith. I have personal knowledge of the facts set forth herein unless otherwise stated.

1           2.       The Committee has concurrently filed a *Motion for an Order Authorizing Disclosure*  
2 *of Independent Review Board Minutes and Aggregated Claims Data* (“Disclosure Motion”) and  
3 supporting declaration (“Michael Declaration”).

4           3.       The Committee proposes to seal the following documents to the Michael Declaration:  
5               • Exhibit A is a true and correct copy of the Claims Data.  
6               • Exhibit B is a sample of true and correct copies of the IRB Minutes  
7               (Debtor\_073755-073929) produced by the Debtor on or about July 10, 2024.  
8               • Exhibit C contains true and correct copies of five sworn proofs of claim that  
9               identify Father David Anthony Ghiorso as an abuser.

10          4.       The Claims Data is aggregated data from the survivors’ proofs of claim in this case,  
11 identifying the number of claims against named perpetrators, where abuse occurred, when the abuse  
12 occurred, types of abuse, the age of the survivors at the time of the abuse, and the age of the  
13 survivors now. The Claims Data is anonymous regarding the claimants and omits any claimant  
14 personal identifying information. The anonymous Claims Data is not confidential, but the proofs of  
15 claim from which it was derived are unquestionably confidential pursuant to the Bar Date Order  
16 entered on November 21, 2023 [Docket No. 337].

17          5.       The IRB Minutes are meeting minutes of the Independent Review Board that  
18 oversees the Debtor’s review of child sexual abuse allegations for the period of 2015-2023. The IRB  
19 Minutes have been redacted by the Debtor and designated as “Confidential” pursuant to the  
20 Stipulated Protective Order entered on December 18, 2023 [Docket No. 374]. The claimant names  
21 are not disclosed, or are redacted, and the perpetrator names are typically anonymized.

22          6.       Five proofs of claim by survivors each detail abuse by Father Ghiorso who remains  
23 on the Debtor’s good standing list despite years of documented child safety concerns. The proofs of  
24 claim are submitted for context and out of the Committee’s concern for public safety. The proofs of  
25 claim are confidential pursuant to the Bar Date Order. Notwithstanding the Bar Date Order, these  
26 claimants have consented to disclosure of their claims.

7. The Disclosure Motion has been redacted regarding any information derived from the IRB Minutes in accordance with their designation as “Confidential” under the Stipulated Protective Order.

Pursuant to 28 U.S.C. sec. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on February 4, 2025 at Minneapolis, Minnesota.

By: /s/ Brittany M Michael  
Brittany M. Michael